

# MONTEVERDE & ASSOCIATES PC

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**Juan E. Monteverde**  
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April 17, 2025

Hon. Jesse M. Furman  
United States District Court Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Joint Letter – *Marc Goldschein v. Avangrid, Inc., et al.*, 25-cv-00772-JMF**

Dear Judge Furman:

We represent Lead Plaintiffs in this action and submit this letter with the consent of Defendants. Pursuant to Your Honor's leadership order dated April 11, 2025, the parties have met and conferred regarding the next steps in the action and propose the following schedule:

- 1) Defendants shall file an answer or response to the Complaint (ECF No. 3) no later than 30 days from the date of an order adopting this schedule;
- 2) If Defendants file a motion under Fed. R. Civ. P. 12 in response to the Complaint ("Motion"), Lead Plaintiffs shall file either an amended complaint pursuant to Fed. R. Civ. P. 15(a)(1)(B) or a response to the Motion no later than 30 days from the date the Motion is served on Lead Plaintiffs;
- 3) Defendants' reply in further support of their Motion shall be filed no later than 14 days from the date Lead Plaintiffs' response is served on Defendants, or, if an amended complaint is filed, the parties shall submit a revised schedule as necessary.

Counsel is available at the Court's convenience.

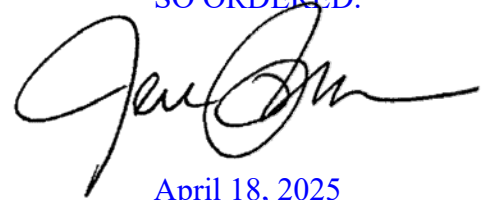
Respectfully,

/s/ Juan E. Monteverde

Juan E. Monteverde

The Court adopts the parties' proposed schedule.

SO ORDERED.



April 18, 2025

cc: All counsel of record (via ECF)